

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JANE DOE, et al.,

Plaintiffs,

v.

**CORRECTIONS CORP. OF AMERICA, et
al.,**

Defendants.

Case No. 3:15-cv-68

Judge Todd Campbell

Magistrate Judge Clifton Knowles

JURY DEMAND

**PLAINTIFFS JANE DOE #1-2'S MOTION FOR LEAVE
TO FILE EXHIBITS UNDER SEAL**

Come now Plaintiffs Jane Doe #1 and Jane Doe #2, through counsel, and pursuant to Fed. R. Civ. P. 5.2(d), hereby move this Honorable Court for leave to file the exhibits to their anticipated motion for summary judgment under seal, with a redacted public filing 10 days thereafter.

As cause for this motion, in light of the embarrassing and humiliating nature of the allegations in this case, the Court has entered protective orders concerning information that could lead to the discovery of Plaintiffs' true identities and governing other confidential information. (*See, e.g.*, Doc. Nos. 11, 31, 70). Thus, a voluminous amount of records protected by the Court's orders may be referenced in the motion. To ensure the Court has access to as complete a record as possible, Plaintiffs propose filing their exhibits under seal.

However, in the interest of public access to the Court's records, Plaintiffs propose that they file a public copy of the anticipated exhibits with necessary redactions 10 days after filing the sealed exhibits.

Wherefore, for the foregoing reasons, Plaintiffs request the Court GRANT this motion for leave to file under seal, with a public, redacted copy to follow 10 days later.

Dated: July 27, 2016

Respectfully submitted,

s/Tricia Herzfeld

Tricia Herzfeld (No. 26014)

Elliott Ozment (No. 4331)

William P. York II (No. 30546)

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CERTIFICATE OF SERVICE

I certify that I served the foregoing document, Motion for Leave, to the following parties or attorneys of record via the Court's Case Management/Electronic Case Filing system on the date inscribed below:

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Attorneys for Defendants

I certify that I served the foregoing document, Motion for Leave, to the following parties or attorneys of record via U.S. mail, first-class postage prepaid thereon:

Jane Doe #3

[Confidential]

Dated: July 27, 2016

Respectfully submitted,

s/Tricia Herzfeld

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